IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

B.P., H.A., and S.H. individually, and On behalf of all others similarly situated,

Plaintiffs,

v. No: 2:23-cv-00071-TRM-JEM

CITY OF JOHNSON CITY, TENNESSEE, et al.,

Defendants.

DECLARATION OF HEATHER MOORE COLLINS

- I, Heather Moore Collins, declare under penalty of perjury that the foregoing is true and correct:
- 1. Attached as **Exhibit 1** are true and correct copies of the subpoenas Defendant Kevin Peters served on February 13, 2024.
- 2. Defendant Peters did not seek leave of Court to serve the subpoenas, nor did he make any attempt to negotiate their contents or method of service with Plaintiffs' counsel in advance.
- 3. Peters and his counsel are aware that the subpoena targets are survivors of violent crimes who understood their identities to be confidential and nevertheless had a private investigator visit their homes and workplaces out of the blue.
- 4. After receiving several alarmed phone calls from unnamed class members, and to avoid emergency motion practice, Plaintiffs' counsel agreed to accept service in exchange for Peters' counsel calling off the private investigator.

5. Based on Plaintiffs' Counsels' communications with unnamed class members, the

service of the subpoenas distressed the recipients and caused them reasonable fear that their

identities were no longer protected.

6.

Plaintiffs agreed to search for and produce certain categories of documents

requested in the subpoenas, even though they relate to unnamed class members, for example,

Plaintiffs' counsel's communications with the prosecution team for the federal public corruption

investigation of the Johnson City Police Department, which spanned 520 pages of emails and

attachments, and communications between unnamed class members and former Special United

States Attorney Kateri Dahl, among other categories.

Respectfully submitted,

/s/ Heather Moore Collins

Heather Moore Collins BPR #026099

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LAW OFFICES

MOORE, RADER AND YORK, P.C.

46 NORTH JEFFERSON AVENUE COOKEVILLE, TENNESSEE 3850 I

L. DEAN MOORE (1941-2019) DANIEL H. RADER III RICHARD LANE MOORE DANIEL H. RADER IV RANDALL A. YORK ANDRE S. GREPPIN WADE BLAIR

February 12, 2024

MAILING ADDRESS POST OFFICE BOX 3347 38502

TELEPHONE (931) 526-3311

FACSIMILE (931) 526-3092

Heather Collins HMC Civil Rights Law 7000 Executive Center Dr., Ste. 320 Brentwood, TN 37027 VIA EMAIL ONLY

Re: Jane Does 1-9 v. City of Johnson City, et al

U.S. District Court for the Eastern District of Tennessee – 2:23-cv-71

Dear Ms. Collins:

In light of Plaintiffs' position, as reflected in Plaintiffs' responses to the respective motions to compel, that none of the Plaintiffs need respond to the written discovery except the three who have utilized initials on the proposed second amended complaint, I needed to go ahead and issue subpoenas to the remaining individuals (to the extent such a proposed amendment is ever granted at some point), as well as one of Laura Trent's sisters who I have reason to believe has had some involvement in this matter. Attached is a notice of service and copies of those subpoenas.

Yours very truly, MOORE, RADER & YORK, P.C.

aniel H. Radute

Daniel H. Rader IV

Cc: Ashley Walter
Elizabeth Kramer
Kevin Osborne
Emily Taylor
Caroline Drinnon
Vanessa Baehr-Jones
Keith Grant
Aaron Wells
Laura Beth Rufalo
Erick Herrin
Kristin Berexa
Ben Allen

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)
JANE DOE 4, JANE DOE 5, K.T. and M.T.,	
Personal Representatives to JANE DOE 6,)
JANE DOE 7, JANE DOE 8, and)
JANE DOE 9,)
Plaintiffs,)
VERSUS) No. 2:23-cv-00071-TRM-CRW
CITY OF JOHNSON CITY, TENNESSEE,)
KARL TURNER, individually and in his	
official capacity as Chief of the	
Johnson City Police Department,	
KEVIN PETERS, individually and in his)
official capacity as Captain in the)
Johnson City Police Department,)
TOMA SPARKS, individually and in his)
official capacity as Detective in the)
Johnson City Police Department, JUSTIN)
JENKINS, individually and in his official)
Capacity as Detective in the Johnson City Police)
Department, and DOES 6-20, inclusive,)
Defendants.)
	,

NOTICE OF SERVICE

Comes now the Defendant, Kevin Peters, by and through the undersigned counsel, and gives notice to all parties in this cause pursuant to Fed. R. Civ. P. 45(a)(4), and gives notices of subpoenas for documents issued to the following individuals:





Copies of the subpoenas are attached hereto.

This the 12th day of February, 2024.

Respectfully submitted,

MOORE, RADER AND YORK, P. C.

By DANIEL H. RADER IV, BPR #025998

DANIEL H. RADER IV, BPR #025998

P. O. Box 3347

Cookeville, TN 38502

Phone: (931) 526-3311 Fax: (931) 526-3092

danny@moorerader.com

Attorneys for Kevin Peters in his

individual capacity

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served upon counsel for the parties in this cause by forwarding same by Email Transmission to said counsel this the 12th day of February, 2024.

Ashley Walter HMC Civil Rights Law, PLLC 7000 Executive Center Dr. Brentwood, TN 37027 615-724-1996

Email: ashley@hmccivilrights.com

Caroline Drinnon HMC Civil Rights Law, PLLC 7000 Executive Center Dr. Brentwood, TN 37027 615-724-1996

Email: caroline@hmccivilrights.com

Heather Moore Collins HMC Civil Rights Law, PLLC 7000 Executive Center Dr. Suite 320 Brentwood, TN 37027 615-724-1996

Email: heather@hmccivilrights.com

Ms. Elizabeth A. Kramer Mr. Kevin M. Osborne Erickson, Kramer Osborne LLP 44 Tehama Street San Francisco CA 94105 (415-635-0631)

Email: <u>elizabeth@eko.law</u> Email: <u>kevin@eko.law</u>

Emily C. Taylor Watson Roach Batson & Lauderback P. O. Box 131 Knoxville, TN 37901-0131 865-637-1700

Email: <u>etaylor@watsonroach.com</u>
Attorney for the City of Johnson City,
Tennessee, and Karl Turner, in his
Individual Capacity

Thomas J. Garland, Jr. Milligan & Coleman, PLLP 230 W Depot St. Greeneville, TN 37743

Email: <u>tgarland@milligancoleman.com</u>
Attorney for the City of Johnson City,
Tennessee, and Karl Turner, in his
Individual capacity

Vanessa Baehr-Jones Advocates for Survivors of Abuse 4200 Park Blvd., No. 413 Oakland, CA 94602 Email: vanessa@advocatesforsurvivors. com

Pro Hac Vice Attorney for Plaintiff

Mr. Keith H. Grant Mr. Philip Aaron Wells Ms. Laura Beth Rufolo Robinson, Smith & Wells 633 Chestnut Street Suite 700 Republic Centre Chattanooga, TN 37450 Email: kgrant@rswlaw.com

Email: awells@rswlaw.com
Email: lrufolo@rswlaw.com

K. Erickson Herrin
Herrin McPeak & Associates
515 E. Unaka Avenue
P. O. Box 629
Johnson City, TN 37605-0629
(423-929-7113)
Attorney for the City of Johnson City,
Tennessee, Karl Turner, in his
individual and official capacities,
Toma Sparks, in his official
capacity, and Kevin Peters, in his
official capacity

Ms. Kristin E. Berexa
Mr. Benjamin C. Allen
Farrar Bates Berexa
12 Cadillac Drive, Suite 480
Brentwood, TN 37027
615-254-3060
Email: kberexa@fbb.law
ballen@fbb.law
Attorneys for Toma Sparks

Vanessa Baehr-Jones Advocates for Survivors of Abuse PC 4200 Park Boulevard No. 413 Oakland, CA 94602 510-500-9634

Email: vanessa@advocatesforsurvivors.com

MOORE, RADER AND YORK, P. C.

s/DANIEL H. RADER IV, BPR 025998
DANIEL H. RADER IV / BPR #025998
P. O. Box 3347
Cookeville, TN 38502
(931-526-3311)
danny@moorerader.com

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al,	
Plaintiff) City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.	Civil Action No. 2:23-cv-00071
Defendant)	
SUBPOENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF PR	
То:	
(Name of person to whom t	his subpoena is directed)
Production: YOU ARE COMMANDED to produce at documents, electronically stored information, or objects, and to	permit inspection, copying, testing, or sampling of the
material All materials described on attached Exhibit A. You are no P. 45(d)(2). You are required to cause the requested ma	ot required to appear in person pursuant to Fed. R. Civ. terials to appear at or before the date of compliance.
Place: HERRIN, McPEAK & ASSOCIATES	Date and Time:
515 East Unaka Avenue Johnson City, TN 37605-0629	March 14, 2024, at 1:00pm Eastern Time
☐ Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, a may inspect, measure, survey, photograph, test, or sample the present the present of t	and location set forth below, so that the requesting party
Place:	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attack Rule 45(d), relating to your protection as a person subject to a su respond to this subpoena and the potential consequences of not de-	bpoena; and Rule 45(e) and (g), relating to your duty to
Date: 2-12-29	
CLERK OF COURT	OR James H. Pacheto
Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-mail address, and telephone number of the	attorney representing (name of party) Kevin Peters
Daniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson Av	, who issues or requests this subpoena, are: e. Cookeville, TN 38501; 931-526-3311;

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this	subpoena for (name of individual and title,	if any)	
☐ I served the	subpoena by delivering a copy to the	named person as follows:	
		on (date)	or
☐ I returned th	ne subpoena unexecuted because:		
Unless the subpetendered to the	poena was issued on behalf of the Unit witness the fees for one day's attenda	ted States, or one of its officers or agents, I nce, and the mileage allowed by law, in the	have also e amount of
y fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under	penalty of perjury that this informatio	n is true.	
te:			
	,	Server's signature	
	·	Printed name and title	
	1	Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply:
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- **(C)** Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.
- (C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.
- (D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

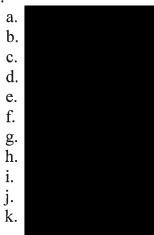
For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

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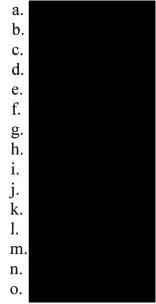
EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

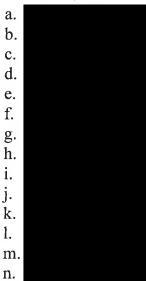




2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

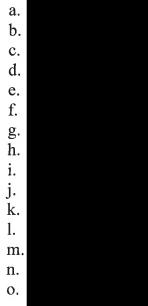


3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



Ο,

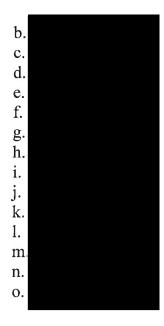
4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m.
n.
o.

- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
- 8. Produce all direct or instant messages between you and Kateri Dahl, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 9. Produce any and all written communications of any kind between you and Kateri Dahl, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 10. Produce any records of phone calls between you and Kateri Dahl.
 - 11. Produce all text messages between you and Sean Williams.
 - 12. Produce all emails between you and Sean Williams.
- 13. Produce all direct or instant messages between you and Sean Williams, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 14. Produce any and all written communications of any kind between you and Sean Williams, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 15. Produce all records of phone calls between you and Sean Williams.
- 16. Produce any and all communications with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee from 2018 to present.
- 17. Produce any and all recordings of interactions with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee.
 - 18. Produce any and all recordings of interactions with Sean Williams.
- 19. Produce any and all recordings of interactions with and any of the following persons:
 - a.



- 20. Produce all text messages between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 21. Produce all emails between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 22. Produce all direct or instant messages between you and any employee or official of Johnson City, Tennessee from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 23. Produce any and all written communications of any kind between you and any employee or official of Johnson City, Tennessee from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
- 24. Produce all records of phone calls between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 25. Produce any and all records and tangible evidence of any kind that evidence any report you made to any employee or official of Johnson City, Tennessee relating to Sean Williams.
- 26. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".

- 27. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
- 28. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 29. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 30. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 31. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
- 32. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 33. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 34. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 35. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "rape," "sexual assault," or any variation of that term.

- 36. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Kateri Dahl.
- 37. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Sean Williams.
- 38. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 39. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "rape," "sexual assault," or any variation of that term.
- 40. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Kateri Dahl.
- 41. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Sean Williams.
- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communication including any attorney representing you communicate agent, or official or employee of the U.S. Attorney's	cating on your behalf), with any F	ou BI

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al,			
Plaintiff) 0.02 0.0074		
City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.	Civil Action No. 2:23-cv-00071		
Defendant)		
	IENTS, INFORMATION, OR OBJECTS OF PREMISES IN A CIVIL ACTION		
To:			
(Name of person to v	whom this subpoena is directed)		
documents, electronically stored information, or objects, ar material All materials described on attached Exhibit A. You	ace at the time, date, and place set forth below the following and to permit inspection, copying, testing, or sampling of the are not required to appear in person pursuant to Fed. R. Civ. and materials to appear at or before the date of compliance.		
Place: HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue Johnson City, TN 37605-0629	Date and Time: March 14, 2024, at 1:00pm Eastern Time		
other property possessed or controlled by you at the time, d may inspect, measure, survey, photograph, test, or sample to Place:	ED to permit entry onto the designated premises, land, or late, and location set forth below, so that the requesting party the property or any designated object or operation on it. Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are a Rule 45(d), relating to your protection as a person subject to respond to this subpoena and the potential consequences of Date: 2-12-24	attached – Rule 45(c), relating to the place of compliance; o a subpoena; and Rule 45(e) and (g), relating to your duty to not doing so.		
CLERK OF COURT	OR Naul H. Red To		
Signature of Clerk or Deputy Cle			
The name, address, e-mail address, and telephone number o	of the attorney representing (name of party) Kevin Peters		
Daniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferso lanny@moorerader.com	, who issues or requests this subpoena are:		
	sues or requests this subpoena lectronically stored information, or tangible things or the		

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Case 2:23-cv-00071-TRM-JEM Document 158-1 Filed 04/18/24 Page 19 of 106 PageID #:

inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

•	oena for (name of individual and title, if c	iny)	
(date)	8		
☐ I served the subp	poena by delivering a copy to the na	med person as follows:	
		on (date)	or
☐ I returned the sui	bpoena unexecuted because:		
Unless the subpoens tendered to the with	a was issued on behalf of the United ess the fees for one day's attendanc	I States, or one of its officers or agents, I sand the mileage allowed by law, in the	have also e amount of
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pena	alty of perjury that this information	is true.	
i			
		Server's signature	
	/ 	Server's signature Printed name and title	
	/		

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person, or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction-which may include lost earnings and reasonable attorney's fees-on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises-or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored

information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)	
JANE DOE 4, JANE DOE 5, K.T. and M.T.,)	
Personal Representatives to JANE DOE 6,)	
JANE DOE 7, JANE DOE 8, and)	
JANE DOE 9,)	
)	
Plaintiffs,)	
)	
VERSUS)	No. 2:23-cv-00071-TRM-CRW
)	
CITY OF JOHNSON CITY, TENNESSEE,)	
KARL TURNER, individually and in his)	
official capacity as Chief of the)	
Johnson City Police Department,)	
KEVIN PETERS, individually and in his)	
official capacity as Captain in the)	
Johnson City Police Department,)	
TOMA SPARKS, individually and in his)	
official capacity as Detective in the)	
Johnson City Police Department, and)	
DOES 5-10, inclusive,)	
)	
Defendants.)	

EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.



2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

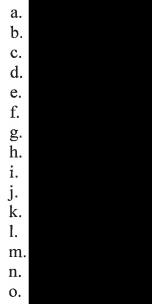


3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m
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0.

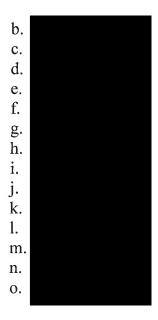
4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m.
n.

- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
- 8. Produce all direct or instant messages between you and Kateri Dahl, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 9. Produce any and all written communications of any kind between you and Kateri Dahl, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 10. Produce any records of phone calls between you and Kateri Dahl.
 - 11. Produce all text messages between you and Sean Williams.
 - 12. Produce all emails between you and Sean Williams.
- 13. Produce all direct or instant messages between you and Sean Williams, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 14. Produce any and all written communications of any kind between you and Sean Williams, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 15. Produce all records of phone calls between you and Sean Williams.
- 16. Produce any and all communications with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee from 2018 to present.
- 17. Produce any and all recordings of interactions with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee.
 - 18. Produce any and all recordings of interactions with Sean Williams.
- 19. Produce any and all recordings of interactions with and any of the following persons:
 - a.



- 20. Produce all text messages between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 21. Produce all emails between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 22. Produce all direct or instant messages between you and any employee or official of Johnson City, Tennessee from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 23. Produce any and all written communications of any kind between you and any employee or official of Johnson City, Tennessee from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
- 24. Produce all records of phone calls between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 25. Produce any and all records and tangible evidence of any kind that evidence any report you made to any employee or official of Johnson City, Tennessee relating to Sean Williams.
- 26. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".

- 27. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
- 28. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 29. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 30. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 31. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
- 32. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 33. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 34. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 35. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "rape," "sexual assault," or any variation of that term.

- 36. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Kateri Dahl.
- 37. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Sean Williams.
- 38. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 39. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "rape," "sexual assault," or any variation of that term.
- 40. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Kateri Dahl.
- 41. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Sean Williams.
- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any kind betw (including any attorney representing you communicating on your behalf), with agent, or official or employee of the U.S. Attorney's Office.	ween you 1 any FBI

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al,	
Plaintiff)	0.00 000071
City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.	Civil Action No. 2:23-cv-00071
Defendant)	
SUBPOENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF PE	TS, INFORMATION, OR OBJECTS REMISES IN A CIVIL ACTION
To:	
(Name of person to whom	this subpoena is directed)
Production: YOU ARE COMMANDED to produce at documents, electronically stored information, or objects, and to	permit inspection, copying, testing, or sampling of the
material All materials described on attached Exhibit A. You are n P. 45(d)(2). You are required to cause the requested ma	ot required to appear in person pursuant to Fed. R. Civ. Iterials to appear at or before the date of compliance.
Place Mail to:	Date and Time:
46 N. Jefferson Ave. Cookeville, TN 38501	March 14, 2024, at 9:00am Eastern Time
☐ Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, a may inspect, measure, survey, photograph, test, or sample the present t	and location set forth below, so that the requesting party
Place:	Date and Time:
The following provisions of Fed. R. Civ. P. 45 are attack Rule 45(d), relating to your protection as a person subject to a su- respond to this subpoena and the potential consequences of not of	abpoena; and Rule 45(e) and (g), relating to your duty to
Date: 2-12-24	
CLERK OF COURT	
s	OR Mult Rucht
Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-mail address, and telephone number of the	attorney representing (name of party) Kevin Peters
Daniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson Av lanny@moorerader.com	, who issues or requests this subpoena, are: e. Cookeville, TN 38501; 931-526-3311;
BY 4° 4 41 Y 1	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(date)			
☐ I served the sul	opoena by delivering a copy to the name	med person as follows:	
-		on (date) ;	or
☐ I returned the s	ubpoena unexecuted because:		
tendered to the wi	na was issued on behalf of the United tness the fees for one day's attendance.	States, or one of its officers or agents, I e, and the mileage allowed by law, in the	have also amount of
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under per	nalty of perjury that this information i	s true.	
e:			
		Server's signature	
	-	Printed name and title	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

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(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction-which may include lost earnings and reasonable attorney's fees-on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition,
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises-or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

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- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
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(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt. The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)	
JANE DOE 4, JANE DOE 5, K.T. and M.T.,)	
Personal Representatives to JANE DOE 6,)	
JANE DOE 7, JANE DOE 8, and)	
JANE DOE 9,)	
)	
Plaintiffs,	Ś	
, ,	í	
VERSUS)	No. 2:23-cv-00071-TRM-CRW
)	
CITY OF JOHNSON CITY, TENNESSEE,)	
KARL TURNER, individually and in his	Ś	
official capacity as Chief of the	j	
Johnson City Police Department,	Ś	
KEVIN PETERS, individually and in his	<u> </u>	
official capacity as Captain in the)	
Johnson City Police Department,	,	
TOMA SPARKS, individually and in his)	
)	
official capacity as Detective in the)	
Johnson City Police Department, and)	
DOES 5-10, inclusive,)	
)	
Defendants.)	

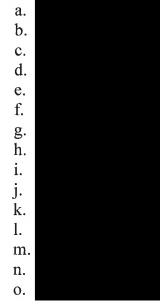
EXHIBIT A TO SUBPOENA DUCES TECUM

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a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.



2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a. b. c. d. e. f. g. h. i. j. k. l. m. n.

o.

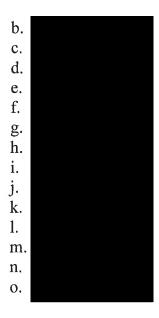
4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m.
n.
o.

5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m.
n.

- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
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- 9. Produce any and all written communications of any kind between you and Kateri Dahl, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 10. Produce any records of phone calls between you and Kateri Dahl.
 - 11. Produce all text messages between you and Sean Williams.
 - 12. Produce all emails between you and Sean Williams.
- 13. Produce all direct or instant messages between you and Sean Williams, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 14. Produce any and all written communications of any kind between you and Sean Williams, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 15. Produce all records of phone calls between you and Sean Williams.
- 16. Produce any and all communications with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee from 2018 to present.
- 17. Produce any and all recordings of interactions with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee.
 - 18. Produce any and all recordings of interactions with Sean Williams.
- 19. Produce any and all recordings of interactions with and any of the following persons:
 - a.



- 20. Produce all text messages between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 21. Produce all emails between you and any employee or official of Johnson City, Tennessee from 2018 to present.
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- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any kind between y (including any attorney representing you communicating on your behalf), with any F agent, or official or employee of the U.S. Attorney's Office.	/ou FBI

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al,		
Plaintiff) City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.)	Civil Action No. 2:23-cv-00071	
Defendant)		
SUBPOENA TO PRODUCE DOCUMEN OR TO PERMIT INSPECTION OF P	TTS, INFORMATION, OR OBJECTS PREMISES IN A CIVIL ACTION	
To:		
(Name of person to whon	n this subpoena is directed)	
Production: YOU ARE COMMANDED to produce a documents, electronically stored information, or objects, and to protocial.	permit inspection, copying, testing, or sampling of the	
materialAll materials described on attached Exhibit A. You are P. 45(d)(2). You are required to cause the requested m	not required to appear in person pursuant to Fed. R. Civ. naterials to appear at or before the date of compliance.	
Place* HERRIN, McPEAK & ASSOCIATES	Date and Time:	
515 East Unaka Avenue Johnson City, TN 37605-0629	March 14, 2024, at 1:00pm Eastern Time	
☐ Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the p	and location set forth below, so that the requesting party	
Place:	Date and Time:	
The following provisions of Fed. R. Civ. P. 45 are attacked to the following provisions of Fe	subpoena; and Rule 45(e) and (g), relating to your duty to	
Date: 2-12-24		
CLERK OF COURT	OP \	
	OR Janul H. Revolute	
Signature of Clerk or Deputy Clerk	Attorney's signature	
The name, address, e-mail address, and telephone number of th		
aniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson A anny@moorerader.com	, who issues or requests this subpoena, are: we. Cookeville, TN 38501; 931-526-3311;	
TAT 41 4 41 TO 1		

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

date)	*		
☐ I served the subj	poena by delivering a copy to the na	med person as follows:	
		on (date)	; or
☐ I returned the su	bpoena unexecuted because:		
tendered to the witn	ness the fees for one day's attendance	States, or one of its officers or agents, e, and the mileage allowed by law, in the	I have also ne amount of
\$	•		
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pena	alty of perjury that this information i		0.00
I declare under pena	alty of perjury that this information i	s true.	0.00

Additional information regarding attempted service, etc.:

emme

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees-on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises-or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
 - (iv) subjects a person to undue burden.
- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

- (2) Claiming Privilege or Protection.(A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
- (B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt,

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3, JANE DOE 4, JANE DOE 5, K.T. and M.T.,)
· · · · · · · · · · · · · · · · · · ·)
Personal Representatives to JANE DOE 6,)
JANE DOE 7, JANE DOE 8, and)
JANE DOE 9,)
DI 1 100)
Plaintiffs,)
)
VERSUS) No. 2:23-cv-00071-TRM-CRW
)
CITY OF JOHNSON CITY, TENNESSEE,)
KARL TURNER, individually and in his)
official capacity as Chief of the)
Johnson City Police Department,)
KEVIN PETERS, individually and in his	
official capacity as Captain in the)
Johnson City Police Department,)
TOMA SPARKS, individually and in his)
official capacity as Detective in the)
Johnson City Police Department, and)
DOES 5-10, inclusive,)
DODO D' TO, MOIGDIVO,)
Defendants.)
Detellualits.)

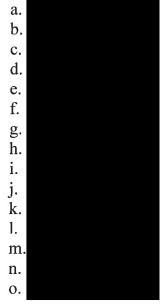
EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.



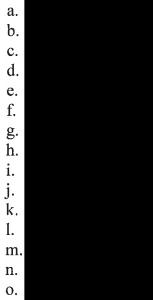
2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
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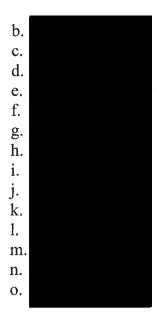
4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

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- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
- 8. Produce all direct or instant messages between you and Kateri Dahl, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
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- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), with any FBI agent, or official or employee of the U.S. Attorney's Office.

United States District Court

for the

JANE DOE 1, et al,			
Plaintiff	0.00 0.0074		
City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.	Civil Action No. 2:23-cv-00071		
Defendant)			
SUBPOENA TO PRODUCE DOCUME OR TO PERMIT INSPECTION OF			
To:			
(Name of person to wh	om this subpoena is directed)		
Production: YOU ARE COMMANDED to produce documents, electronically stored information, or objects, and	e at the time, date, and place set forth below the following to permit inspection, copying, testing, or sampling of the		
material All materials described on attached Exhibit A. You are			
Place HERRIN, McPEAK & ASSOCIATES	Date and Time:		
515 East Unaka Avenue Johnson City, TN 37605-0629	March 14, 2024, at 1:00pm Eastern Time		
☐ Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.			
Place:	Date and Time:		
The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.			
Date: 212-24			
CLERK OF COURT	OR Jamel H. Radite		
Signature of Clerk or Deputy Clerk	Attorney's signature		
The name, address, e-mail address, and telephone number of	the attorney representing (name of party) Kevin Peters		
Daniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson	, who issues or requests this subpoena, are:		
danny@moorerader.com			

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Case 2:23-cv-00071-TRM-JEM Document 158-1 Filed 04/18/24 Page 52 of 106 PageID #:

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	I received this sul	bpoena for (name of individual and title, ij	(any)	
on (date)	8		
	☐ I served the su	bpoena by delivering a copy to the n	amed person as follows:	
8			on (date)	; or
	☐ I returned the	subpoena unexecuted because:		
,	tendered to the w	ena was issued on behalf of the Unite itness the fees for one day's attendant.	ed States, or one of its officers or agents, ace, and the mileage allowed by law, in the	I have also se amount of
My fees		for travel and \$	for services, for a total of \$	0.00
	I declare under pe	enalty of perjury that this information	is true.	
Date:				
			Server's signature	
			Printed name and title	
		-	Server's address	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance,

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees-on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be

otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information, These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored

information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim,

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)	
JANE DOE 4, JANE DOE 5, K.T. and M.T.,)	
Personal Representatives to JANE DOE 6,)	
JANE DOE 7, JANE DOE 8, and)	
JANE DOE 9,)	
•)	
Plaintiffs,)	
,	í	
VERSUS	Ś	No. 2:23-cy-00071-TRM-CRW
	Ś	The state of the s
CITY OF JOHNSON CITY, TENNESSEE,	Ś	
KARL TURNER, individually and in his	Ś	
official capacity as Chief of the	Ś	
Johnson City Police Department,	ĺ	
KEVIN PETERS, individually and in his	Ś	
official capacity as Captain in the)	
Johnson City Police Department,)	
TOMA SPARKS, individually and in his)	Đ
official capacity as Detective in the)	
Johnson City Police Department, and)	
DOES 5-10, inclusive,)	
DOES 3-10, Inclusive,)	
Defendant)	
Defendants.)	

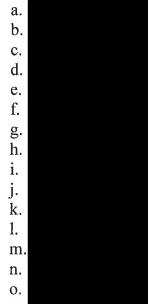
EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



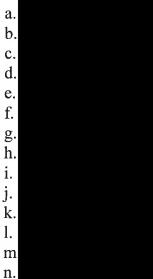


2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



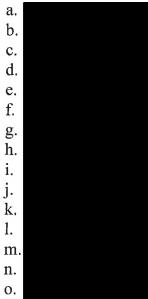
3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

persons is included:



O.

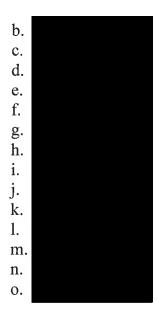
4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
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- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
- 8. Produce all direct or instant messages between you and Kateri Dahl, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 9. Produce any and all written communications of any kind between you and Kateri Dahl, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 10. Produce any records of phone calls between you and Kateri Dahl.
 - 11. Produce all text messages between you and Sean Williams.
 - 12. Produce all emails between you and Sean Williams.
- 13. Produce all direct or instant messages between you and Sean Williams, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 14. Produce any and all written communications of any kind between you and Sean Williams, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 15. Produce all records of phone calls between you and Sean Williams.
- 16. Produce any and all communications with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee from 2018 to present.
- 17. Produce any and all recordings of interactions with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee.
 - 18. Produce any and all recordings of interactions with Sean Williams.
- 19. Produce any and all recordings of interactions with and any of the following persons:
 - a.



- 20. Produce all text messages between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 21. Produce all emails between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 22. Produce all direct or instant messages between you and any employee or official of Johnson City, Tennessee from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 23. Produce any and all written communications of any kind between you and any employee or official of Johnson City, Tennessee from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
- 24. Produce all records of phone calls between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 25. Produce any and all records and tangible evidence of any kind that evidence any report you made to any employee or official of Johnson City, Tennessee relating to Sean Williams.
- 26. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".

- 27. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
- 28. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 29. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 30. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
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- 32. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 33. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 34. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
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- 39. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "rape," "sexual assault," or any variation of that term.
- 40. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Kateri Dahl.
- 41. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Sean Williams.
- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any ki (including any attorney representing you communicating on your behal agent, or official or employee of the U.S. Attorney's Office.	nd between you lf), with any FBI

UNITED STATES DISTRICT COURT

for the

cormation, or objects ES IN A CIVIL ACTION Dena is directed) e, date, and place set forth below the following inspection, copying, testing, or sampling of the red to appear in person pursuant to Fed. R. Civ. to appear at or before the date of compliance.
e, date, and place set forth below the following inspection, copying, testing, or sampling of the red to appear in person pursuant to Fed. R. Civ. to appear at or before the date of compliance.
e, date, and place set forth below the following inspection, copying, testing, or sampling of the red to appear in person pursuant to Fed. R. Civ. to appear at or before the date of compliance.
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red to appear in person pursuant to Fed. R. Civ. o appear at or before the date of compliance.
o appear at or before the date of compliance.
and Time:
March 14, 2024, at 1:00pm Eastern Time
entry onto the designated premises, land, or tion set forth below, so that the requesting party or any designated object or operation on it.
and Time:
ule 45(c), relating to the place of compliance; and Rule 45(e) and (g), relating to your duty to o.
R Naul H. Rud W
Attorney's signature
na SO

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subj	ooena for (name of individual and title, if c	ny)	
(date) 	*		
☐ I served the sub	poena by delivering a copy to the na	med person as follows:	
		On (date)	; or
☐ I returned the su	bpoena unexecuted because:		
Unless the subpoer tendered to the with	na was issued on behalf of the Unitedness the fees for one day's attendance	States, or one of its officers or agents, le, and the mileage allowed by law, in the	I have also e amount of
\$	· ·		
fees are \$	for travel and \$	for services, for a total of \$	0.00
I declare under pen	alty of perjury that this information	is true.	
:			
*'	·	Server's signature	
	:=	Printed name and title	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - **(B)** inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to pennit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
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(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

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(e) Duties in Responding to a Subpoena.

- (1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
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(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
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(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

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(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

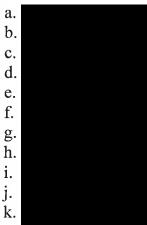
For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

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EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:





2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

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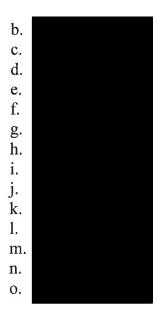
4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
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- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
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 - 15. Produce all records of phone calls between you and Sean Williams.
- 16. Produce any and all communications with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee from 2018 to present.
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 - 18. Produce any and all recordings of interactions with Sean Williams.
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 - a.



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- 32. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 33. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 34. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
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- 36. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Kateri Dahl.
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- 38. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 39. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "rape," "sexual assault," or any variation of that term.
- 40. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Kateri Dahl.
- 41. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Sean Williams.
- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any k (including any attorney representing you communicating on your behaugent, or official or employee of the U.S. Attorney's Office.	ind between you alf), with any FBI

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al,	
Plaintiff)	0.00 0.0074
City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.	Civil Action No. 2:23-cv-00071
Defendant)	
SUBPOENA TO PRODUCE DOCUMENT OR TO PERMIT INSPECTION OF P	ΓS, INFORMATION, OR OBJECTS REMISES IN A CIVIL ACTION
To:	145
(Name of person to whom	this subpoena is directed)
Production: YOU ARE COMMANDED to produce at documents, electronically stored information, or objects, and to material All materials described on attached Exhibit A. You are no P. 45(d)(2). You are required to cause the requested materials	permit inspection, copying, testing, or sampling of the not required to appear in person pursuant to Fed. R. Civ.
Place: HERRIN, McPEAK & ASSOCIATES	Date and Time:
515 East Unaka Avenue Johnson City, TN 37605-0629	March 14, 2024, at 1:00pm Eastern Time
Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, a may inspect, measure, survey, photograph, test, or sample the property. Place:	and location set forth below, so that the requesting party
The following provisions of Fed. R. Civ. P. 45 are attacked Rule 45(d), relating to your protection as a person subject to a surrespond to this subpoena and the potential consequences of not of Date: 2-12-24	ubpoena; and Rule 45(e) and (g), relating to your duty to
CLERK OF COURT	
	OR Jamel H. Resolute
Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-mail address, and telephone number of the	
Paniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson Av	, who issues or requests this subpoena, are:
anny@moorerader.com	
Notice to the person who issues of	or requests this subnoena

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Case 2:23-cv-00071-TRM-JEM Document 158-1 Filed 04/18/24 Page 74 of 106 PageID #:

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

	°		
☐ I served the sub	poena by delivering a copy to the nar	ned person as follows:	
		on (date)	; or
☐ I returned the su	ubpoena unexecuted because:		
Unless the subpoer tendered to the with	na was issued on behalf of the United ness the fees for one day's attendance	States, or one of its officers or agents, and the mileage allowed by law, in the	I have also e amount of
\$			
fees are \$	for travel and \$	for services, for a total of \$	0.00
		· ·	
I declare under pen	alty of perjury that this information is	true.	
		true.	
		Server's signature	
		Server's signature	
		Server's signature	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

(A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or

(B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial

(2) For Other Discovery. A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply:
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

- (iv) subjects a person to undue burden.(B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court-may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)	
JANE DOE 4, JANE DOE 5, K.T. and M.T.,)	
Personal Representatives to JANE DOE 6,)	
JANE DOE 7, JANE DOE 8, and)	
JANE DOE 9,)	
)	
Plaintiffs,)	
)	
VERSUS)	No. 2:23-cv-00071-TRM-CRW
)	
CITY OF JOHNSON CITY, TENNESSEE,)	
KARL TURNER, individually and in his)	
official capacity as Chief of the)	
Johnson City Police Department,)	
KEVIN PETERS, individually and in his)	
official capacity as Captain in the)	
Johnson City Police Department,)	
TOMA SPARKS, individually and in his)	
official capacity as Detective in the)	
Johnson City Police Department, and)	
DOES 5-10, inclusive,)	
)	
Defendants.)	

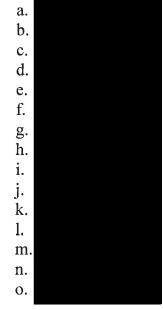
EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

```
a. b. c. d. e. f. g. h. i. j. k.
```



2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

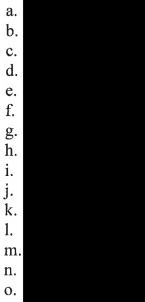


3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m.
n.

O.

4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

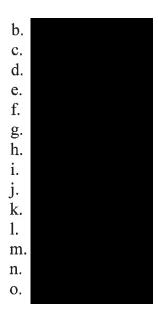


5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
l.
m.
n.

- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
- 8. Produce all direct or instant messages between you and Kateri Dahl, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 9. Produce any and all written communications of any kind between you and Kateri Dahl, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 10. Produce any records of phone calls between you and Kateri Dahl.
 - 11. Produce all text messages between you and Sean Williams.
 - 12. Produce all emails between you and Sean Williams.
- 13. Produce all direct or instant messages between you and Sean Williams, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 14. Produce any and all written communications of any kind between you and Sean Williams, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
 - 15. Produce all records of phone calls between you and Sean Williams.
- 16. Produce any and all communications with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee from 2018 to present.
- 17. Produce any and all recordings of interactions with Johnson City, Tennessee, including any employee or official of Johnson City, Tennessee.
 - 18. Produce any and all recordings of interactions with Sean Williams.
- 19. Produce any and all recordings of interactions with and any of the following persons:

a.



- 20. Produce all text messages between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 21. Produce all emails between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 22. Produce all direct or instant messages between you and any employee or official of Johnson City, Tennessee from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
- 23. Produce any and all written communications of any kind between you and any employee or official of Johnson City, Tennessee from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request.
- 24. Produce all records of phone calls between you and any employee or official of Johnson City, Tennessee from 2018 to present.
- 25. Produce any and all records and tangible evidence of any kind that evidence any report you made to any employee or official of Johnson City, Tennessee relating to Sean Williams.
- 26. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".

- 27. Produce all text messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
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- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any kind between goincluding any attorney representing you communicating on your behalf), with any agent, or official or employee of the U.S. Attorney's Office.	you FBI

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al,	
Plaintiff)	Civil Action No. 2:23-cv-00071
City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al.	Civil Action No.
Defendant)	
SUBPOENA TO PRODUCE DOCUMEN OR TO PERMIT INSPECTION OF I	
To:	
(Name of person to who	m this subpoena is directed)
Production: YOU ARE COMMANDED to produce documents, electronically stored information, or objects, and t	o permit inspection, copying, testing, or sampling of the
material in materials described on attached Exhibit A. You are P. 45(d)(2). You are required to cause the requested n	not required to appear in person pursuant to Fed. R. Civ. naterials to appear at or before the date of compliance.
Place: 17001 Epson Ct.	Date and Time:
Louisville, KY 40245	March 14, 2024, at 9:00am Eastern Time
other property possessed or controlled by you at the time, date may inspect, measure, survey, photograph, test, or sample the	e, and location set forth below, so that the requesting party property or any designated object or operation on it.
riace.	Date and Time:
Rule 45(d), relating to your protection as a person subject to a respond to this subpoena and the potential consequences of no	subpoena; and Rule 45(e) and (g), relating to your duty to t doing so.
Date: 2-12-24	
CLERK OF COURT	OR Jan H. Red TV
Signature of Clerk or Deputy Clerk	Attorney's signature
The name, address, e-mail address, and telephone number of the	ne attorney representing (name of party) Kevin Peters
Daniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson A	who issues or requests this subpoena, are:
Notice to the newson who issue	

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Case 2:23-cv-00071-TRM-JEM Document 158-1 Filed 04/18/24 Page 85 of 106 PageID #:

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

(date)	4	iny)	
	<u> </u>		
☐ I served the sub	poena by delivering a copy to the na	med person as follows:	
		on (date)	; or
☐ I returned the su	ubpoena unexecuted because:		
Unless the subpoer tendered to the with	na was issued on behalf of the United ness the fees for one day's attendance	States, or one of its officers or agents, e, and the mileage allowed by law, in the	I have also ne amount of
\$	·		
fees are \$	for travel and \$	for services, for a total of \$	0.00
I doolare under non	alter of manisum, Aland Alain in Comments		
I declare under pen	alty of perjury that this information i	s true.	
		Server's signature	
		Server's signature	

Additional information regarding attempted service, etc.:

Print

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
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- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

(ii) is commanded to attend a trial and would not incur substantial expense.

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(A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and

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(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

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- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
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(A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- **(B)** When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

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otherwise met without undue hardship; and

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- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
- (A) Documents. A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.
- (B) Form for Producing Electronically Stored Information Not Specified. If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form. The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information. The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

- (A) Information Withheld. A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:
 - (i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) Contempt.

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

For access to subpoena materials, see Fed. R. Civ. P. 45(a) Committee Note (2013).

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

JANE DOE 1, JANE DOE 2, JANE DOE 3,)	
JANE DOE 4, JANE DOE 5, K.T. and M.T.,)	
Personal Representatives to JANE DOE 6,)	
JANE DOE 7, JANE DOE 8, and)	
JANE DOE 9,)	
)	
Plaintiffs,)	
,)	
VERSUS	í	No. 2:23-cv-00071-TRM-CRW
)	
CITY OF JOHNSON CITY, TENNESSEE,	j	
KARL TURNER, individually and in his)	
official capacity as Chief of the)	
Johnson City Police Department,	Ś	
KEVIN PETERS, individually and in his	í	
official capacity as Captain in the)	
Johnson City Police Department,)	
TOMA SPARKS, individually and in his)	
· · · · · · · · · · · · · · · · · · ·)	
official capacity as Detective in the)	
Johnson City Police Department, and)	
DOES 5-10, inclusive,)	
)	
Defendants.)	

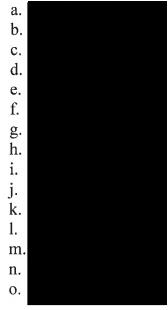
EXHIBIT A TO SUBPOENA DUCES TECUM

1. Produce all text messages between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a. b. c. d. e. f. g. h. i. j. k.



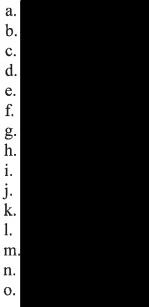
2. Produce all emails between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:



3. Produce all direct or instant messages including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a. b. c. d. e. f. g. h. i. j. k. l. m. n.

4. Produce any and all written communications of any kind including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

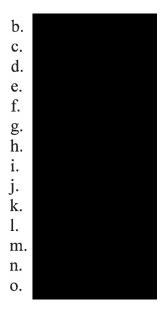


5. Produce all records of phone calls between you and any of the following persons, including but not limited to any group messages, in which any of the following persons is included:

a.
b.
c.
d.
e.
f.
g.
h.
i.
j.
k.
1.
m.
n.
o.

- 6. Produce all text messages between you and Kateri Dahl.
- 7. Produce all emails between you and Kateri Dahl.
- 8. Produce all direct or instant messages between you and Kateri Dahl, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever.
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 - 11. Produce all text messages between you and Sean Williams.
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 - 18. Produce any and all recordings of interactions with Sean Williams.
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a.



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- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any kind between (including any attorney representing you communicating on your behalf), with any agent, or official or employee of the U.S. Attorney's Office.	you FBI

UNITED STATES DISTRICT COURT

for the

JANE DOE 1, et al, Plaintiff City of Johnson City, Tennessee, Karl Turner, Kevin Peters, Toma Sparks, Justin Jenkins, et al. Defendant	Civil Action No. 2:23-cv-00071
SUBPOENA TO PRODUCE DOCUMEN	TS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF P	PREMISES IN A CIVIL ACTION
To:	
(Name of person to whon	n this subpoena is directed)
✓ Production: YOU ARE COMMANDED to produce a	at the time, date, and place set forth below the following
documents, electronically stored information, or objects, and to	permit inspection, copying, testing, or sampling of the
material materials described on attached Exhibit A. You are P. 45(d)(2). You are required to cause the requested m	not required to appear in person pursuant to Fed. R. Civ., naterials to appear at or before the date of compliance.
Place; IEDDIN M. BEAKS, 1999 SMEETS	Date and Time:
Place HERRIN, McPEAK & ASSOCIATES 515 East Unaka Avenue Johnson City, TN 37605-0629	March 14, 2024, at 1:00pm Eastern Time
Inspection of Premises: YOU ARE COMMANDED to other property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, may inspect, measure, survey, photograph, test, or sample the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the time, date, and the property possessed or controlled by you at the property possessed or contr	and location set forth below, so that the requesting party
The following provisions of Fed. R. Civ. P. 45 are attacked Rule 45(d), relating to your protection as a person subject to a strespond to this subpoena and the potential consequences of not Date: 2-12-24	subpoena; and Rule 45(e) and (g), relating to your duty to
CLERK OF COURT	OP.
Signature of Clerk or Deputy Clerk	OR Jaml N. Radite Attorney's signature
The name, address, e-mail address, and telephone number of th	, who issues or requests this subpoena, are:
aniel H. Rader IV; Moore, Rader & York P.C., 46 N. Jefferson A annv@moorerader.com	ve. Cookeville, TN 38501; 931-526-3311;
Notice to the person who issues	or requests this submound

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before

it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 2:23-cv-00071

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

☐ I served the sub	ppoena by delivering a copy to the nar	med person as follows:	
:=		on (date)	; or
☐ I returned the s	ubpoena unexecuted because:		
Unless the subpoetendered to the with	na was issued on behalf of the United	States, or one of its officers or agents, le, and the mileage allowed by law, in the	I have also e amount of
Φ	·	,	
es are \$	for travel and \$	for services, for a total of \$	0.00
I declare under per	nalty of perjury that this information i	s true.	
I declare under per	nalty of perjury that this information i	s true.	
I declare under per	nalty of perjury that this information i	Server's signature	- Tu
I declare under per	nalty of perjury that this information i		*11
I declare under per	nalty of perjury that this information i	Server's signature	
I declare under per	nalty of perjury that this information i	Server's signature	

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

- (1) For a Trial, Hearing, or Deposition. A subpoena may command a person to attend a trial, hearing, or deposition only as follows:
- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person

(i) is a party or a party's officer; or

- (ii) is commanded to attend a trial and would not incur substantial expense.
- (2) For Other Discovery. A subpoena may command:
- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
 - (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) Avoiding Undue Burden or Expense; Sanctions. A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney's fees—on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

- (A) Appearance Not Required. A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.
- (B) Objections. A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:
- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

- (A) When Required. On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:
 - (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

- (B) When Permitted. To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:
- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

- (ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.
- (C) Specifying Conditions as an Alternative. In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:
- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
 - (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

- (1) Producing Documents or Electronically Stored Information. These procedures apply to producing documents or electronically stored information:
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- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.
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The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

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IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TENNESSEE GREENEVILLE DIVISION

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JANE DOE 4, JANE DOE 5, K.T. and M.T.,)
Personal Representatives to JANE DOE 6,)
JANE DOE 7, JANE DOE 8, and)
JANE DOE 9,)
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Plaintiffs,)
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VERSUS) No. 2:23-cv-00071-TRM-CRW
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CITY OF JOHNSON CITY, TENNESSEE,)
KARL TURNER, individually and in his)
official capacity as Chief of the)
Johnson City Police Department,)
KEVIN PETERS, individually and in his)
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TOMA SPARKS, individually and in his)
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DOES 5-10, inclusive,)
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Defendants.)

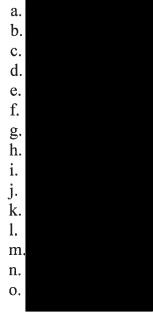
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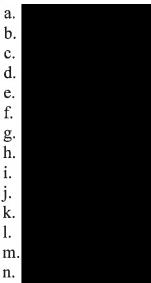
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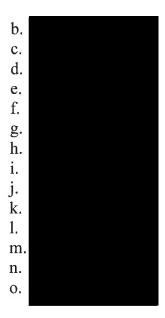
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- 31. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing "rape," "sexual assault," or any variation of that term.
- 32. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Kateri Dahl.
- 33. Produce all emails between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present referencing Sean Williams.
- 34. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 35. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing "rape," "sexual assault," or any variation of that term.

- 36. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Kateri Dahl.
- 37. Produce all direct or instant messages between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including messages transmitted on Facebook, Instagram, Twitter/X, Slack, G-Chat, or any other messaging platform or feature of any platform of any kind whatsoever, referencing Sean Williams.
- 38. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "police" or any variation of that term or related terms, including "JCPD," "cop," "Detective," "Sergeant," "Captain," "Investigator" or "Chief".
- 39. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing "rape," "sexual assault," or any variation of that term.
- 40. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Kateri Dahl.
- 41. Produce any and all written communications of any kind between you and any other person (other than your attorneys during the time they have represented you) from 2018 to present, including but not limited to letters, notes, memoranda, or any other form of written communication whatsoever not covered by or produced in response to any other Request, referencing Sean Williams.
- 42. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), and the District Attorney's Office for the judicial district that includes Johnson City (e.g First Judicial District), and any of the employees or officials with the District Attorney's Office.

43. Produce any and all written communications of any kind between you (including any attorney representing you communicating on your behalf), with any FBI agent, or official or employee of the U.S. Attorney's Office.	